## DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY	) ) )	D.T.E. 02-85
	)	

## PETITION FOR LIMITED PARTICIPANT STATUS OF KEYSPAN ENERGY DELIVERY NEW ENGLAND

KeySpan Energy Delivery New England <sup>1</sup> ("KeySpan" or the "Company"), pursuant to 220 C.M.R. 1.03, hereby petitions the Department of Telecommunications and Energy ("Department") for limited participant status in the above-captioned proceeding. In support of this request, KeySpan states the following:

- 1. The KeySpan companies are Massachusetts corporations located at 52 Second Avenue, Waltham, MA 02451.
- 2. The KeySpan companies are gas companies, as defined in G.L. c. 164, § 1, and are regulated by the Department, pursuant to G.L. c. 164.
- 3. The Department indicated that it would review the petition of Fitchburg Gas and Electric Light Company ("Fitchburg") for approval of renewal of several gas capacity contracts with Tennessee Gas Pipeline Company, and to transfer small increments of long-haul capacity to short-haul capacity.

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The Massachusetts local distribution companies that do business as KeySpan Energy Delivery New England are Boston Gas Company, Colonial Gas Company and Essex Gas Company. Together these three companies seek limited participant status.

4. The Department's review of these matters is likely to raise issues dealing with gas

capacity contracts that are common to other gas companies in Massachusetts, including

KeySpan.

5. KeySpan's limited participant status will not jeopardize the Department's review

in any way.

6. KeySpan's interests are unique and cannot be adequately represented by any other

party.

7. Accordingly, KeySpan seeks to take part as a limited participant in this case, and

where appropriate, to file comments attend and participate in technical conferences, submit

briefs, and to participate in this proceeding in any other manner deemed appropriate for limited

participants by the Hearing Officer.

Wherefore, KeySpan respectfully requests that the Department grant this Petition for

Limited Participant Status.

Respectfully submitted,

Patricia Crowe, Counsel

KeySpan Energy Delivery New England

52 Second Avenue

Waltham, MA 02451

(781) 466-5131

Dated: February 20, 2003

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